

# Exhibit A

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

### This Document Relates to:

## **PLAINTIFF FACT SHEET – SCHOOL DISTRICTS**

[Insert case name and number]

## INSTRUCTIONS

Use of this fact sheet. Each school-district plaintiff that has filed a complaint in this action must complete this Plaintiff Fact Sheet. If more than one school district is a plaintiff on a single complaint, each individual school district must submit its own individual Plaintiff Fact Sheet. This Plaintiff Fact Sheet constitutes discovery responses subject to the Federal Rules of Civil Procedure. The information provided will only be used for purposes related to this litigation and may be disclosed only as permitted by the Protective Order entered in this litigation.

Terms used. “You,” “your,” “Plaintiff,” and “School District” as used throughout this fact sheet refers to the school district completing this form. “Social media” refers to Defendants’ social media platforms as described in your complaint.

Certification. In completing this Plaintiff Fact Sheet, you are representing that you are an authorized representative of the school district bringing the lawsuit. You must certify under oath that the information is true and correct to the best of your knowledge, information, and belief.

Instructions regarding requests for information. Do not leave any questions unanswered or blank; if you cannot recall all of the information requested, provide as much information as you can. You should insert additional space where necessary to answer the questions completely. You should consult with your attorney about completing this form. None of the requests are designed to require an expert evaluation or limit expert testimony. None of the requests are designed to require review of individual student records.

1                   Instructions regarding document requests. For each question calling for the production of  
 2 documents, indicate whether you possess any existing documents responsive to the request. A  
 3 request will indicate where it only requires that you produce information that has already been  
 4 compiled and/or exists in report, survey, analysis, study, or other document that provides an  
 5 overview of or describes the indicated topic. If information has not been compiled or summarized  
 6 on these topics, it does not need to be located, described, or produced for the purposes of this  
 Plaintiff Fact Sheet. For example, you are not required to locate, compile, sort, describe or produce  
 underlying records that might show, for example, the prevalence of student use of social media or  
 expenses incurred to address problems arising from student use of social media; however, you are  
 required to produce existing reports, surveys, analyses, studies, or other overviews on that topic.

7                   To determine whether you have any responsive documents, you are required to investigate  
 8 whether you have the information sought. This investigation might involve a district employee  
 9 asking the appropriate person at each school to provide the district with documents or reports  
 responsive to the requests. You do not need to create any new documents.

10                  If you do possess any such documents, reports, surveys, analyses, studies, or other  
 11 overview documents, then provide copies as they are kept in the ordinary course of business,  
 12 without identifying any student-specific data.

13 **I. CASE INFORMATION**

14 1. Plaintiff: \_\_\_\_\_

15 2. Name of the court in which the complaint was initially filed: \_\_\_\_\_

16 3. Case number in court in which complaint was originally filed: \_\_\_\_\_

17 4. Filing date of the complaint: \_\_\_\_\_

18 5. Named defendants in the complaint: \_\_\_\_\_  
 \_\_\_\_\_

20 6. Name, firm, and e-mail address of the principal attorney(s) representing Plaintiff:  
 21 \_\_\_\_\_

23 **II. REPRESENTATIVE CAPACITY**

24 *For purposes of Section II (Representative Capacity) "you" refers to the person filling out this  
 25 form. When you complete the rest of this form "you," "your," "Plaintiff," and "School District"  
 26 refers to the School District Plaintiff named in this action, including any departments, divisions,  
 agents, and/or employees.*

27 7. Name of individual(s) completing this Fact Sheet: \_\_\_\_\_

8. Role within Plaintiff's organization: \_\_\_\_\_

### **III. SCHOOL DISTRICT DATA**

9. Provide the total number of schools in your district at each level from kindergarten through 12<sup>th</sup> grade from the 2017-2018 school year to present or the year for which data is most currently available:

Year	Level	Number of Schools
2023-2024	Elementary School	
	Middle School	
	High School	
	Other	
2022-2023	Elementary School	
	Middle School	
	High School	
	Other	
2021-2022	Elementary School	
	Middle School	
	High School	
	Other	
2020-2021	Elementary School	

1		Middle School	
2		High School	
3		Other	
4			
5	2019-2020	Elementary School	
6		Middle School	
7		High School	
8		Other	
9			
10	2018-2019	Elementary School	
11		Middle School	
12		High School	
13		Other	
14			
15	2017-2018	Elementary School	
16		Middle School	
17		High School	
18		Other	
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10. Provide the total number of students enrolled in your district, and the student population at each level from kindergarten through 12<sup>th</sup> grade from 2017-2018 to present or to the year for which data is most currently available:

1	<b>Year</b>	<b>Level</b>	<b>Number of Students</b>
2	2023-2024	District-Wide	
3		Elementary School	
4		Middle School	
5		High School	
6		Other	
7	2022-2023	District-Wide	
8		Elementary School	
9		Middle School	
10		High School	
11		Other	
12	2021-2022	District-Wide	
13		Elementary School	
14		Middle School	
15		High School	
16		Other	
17	2020-2021	District-Wide	
18		Elementary School	

1		Middle School	
2		High School	
3		Other	
4			
5	2019-2020	District-Wide	
6		Elementary School	
7		Middle School	
8		High School	
9		Other	
10			
11	2018-2019	District-Wide	
12		Elementary School	
13		Middle School	
14		High School	
15		Other	
16			
17	2017-2018	District-Wide	
18		Elementary School	
19		Middle School	
20		High School	
21		Other	
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1 11. Provide the total number of district employees from 2017-2018 to present or to the year for  
2 which data is most currently available (specified as Full Time Equivalents (“FTE”) if  
2 available):

<b>Year</b>	<b>Number of Employees</b>
2023-2024	
2022-2023	
2021-2022	
2020-2021	
2019-2020	
2018-2019	
2017-2018	

16 12. Provide the total number of teachers employed by your district from 2017-2018 to present  
17 or to the year for which data is most currently available (specified as FTE if available):

<b>Year</b>	<b>Number of Teachers</b>
2023-2024	
2022-2023	
2021-2022	
2020-2021	
2019-2020	
2018-2019	

2017-2018	
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13. Provide the total number of on-campus health care workers (e.g., social workers, nurses, psychologists, psychiatrists, counselors, etc.) employed by the district from 2017-2018 to present or to the year for which data is most currently available (specified as FTE if available), as well as the total number of volunteers in these positions, if any:

Year	Number of On-Campus Health Care Workers	Number of On-Campus Health Care Volunteers
2023-2024		
2022-2023		
2021-2022		
2020-2021		
2019-2020		
2018-2019		
2017-2018		

14. Provide the total number of off-campus health care workers (e.g., social workers, nurses, psychologists, psychiatrists, counselors, etc.) employed by the district from 2017-2018 to present or to the year for which data is most currently available (specified as FTE if available), as well as the total number of volunteers in these positions, if any:

Year	Number of Off-Campus Health Care Workers	Number of Off-Campus Health Care Volunteers

1	2023-2024		
2	2022-2023		
3	2021-2022		
4	2020-2021		
5	2019-2020		
6	2018-2019		
7	2017-2018		
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12 15. Other than health care workers identified above, does the district have other employees  
 13 who provide mental health services? **If yes**, provide the total number of such employees  
 14 from 2017-2018 to present or to the year for which data is most currently available and  
 15 their positions (specified as FTE if available), as well as the total number of volunteers in  
 16 these positions, if any:

16 <b>Year</b>	17 <b>Number of Employees</b>	18 <b>Number of Volunteers</b>	19 <b>Positions</b>
20 2023-2024			
21 2022-2023			
22 2021-2022			
23 2020-2021			
24 2019-2020			
25 2018-2019			
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	2017-2018		
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16. Provide the total number of health care workers (e.g., social workers, nurses, psychologists, psychiatrists, counselors) employed by the district whose primary responsibilities include addressing student mental health issues from 2017-2018 to present or to the year for which data is most currently available and their positions (specified as FTE if available), as well as the total number of volunteers in these positions, if any:

Year	Number of Employees	Number of Volunteers	Positions
2023-2024			
2022-2023			
2021-2022			
2020-2021			
2019-2020			
2018-2019			
2017-2018			

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17. Does your district maintain organizational charts depicting the district's general organizational structure?

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\_\_\_\_ Yes \_\_\_\_ No

If yes, please provide a copy of the organizational chart(s) for the most recent year it is available.

**IV. PEOPLE WITH KNOWLEDGE**

18. Identify the superintendent(s), vice/assistant superintendent(s), director of student and family services, director of school health and/or safety, director of technology, and chief

financial officer/head of finance, or the individuals in equivalent positions, in your district from 2017-2018 school year to the present:

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19. To the extent not listed above, identify the person(s), including their title/position, at the district level whose primary responsibility was the district's budget, funding, or grant procurement efforts from the 2017-2018 school year to the present:

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20. Identify the person(s), including their title/position, in your district most knowledgeable about student use of social media on school property and the impact of such use on your district from the 2017-2018 school year to the present:

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21. To the extent not listed above, identify the person(s), including their title/position, in your district most knowledgeable about student mental health issues from the 2017-2018 school year to the present:

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1      **V. DAMAGES**

2      22. State generally in what way or how you claim you have been damaged by each defendant's  
3      alleged acts at issue in this lawsuit and approximately when that injury began.

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5      \_\_\_\_\_  
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19     23. Are you seeking any monetary damages?

20         Yes  No

21     If yes, identify each category of damages or monetary relief that you allege.

22     \_\_\_\_\_  
23     \_\_\_\_\_  
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4 24. Are you seeking injunctive relief other than abatement?

5 \_\_\_\_\_ Yes \_\_\_\_\_ No

6 If yes, provide a general description of the injunctive relief sought.

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8 \_\_\_\_\_  
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15 25. Are you seeking abatement (e.g. forward looking relief to address the problem, including  
16 continuation of existing programs, expansion of some or all of those programs, and/or  
17 creation of new programs)?

18 \_\_\_\_\_ Yes \_\_\_\_\_ No

19 If yes, provide a general description of the abatement sought.

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1 26. Do you possess any existing report, survey, analysis, study or other document that provides  
2 an overview of or describes known expenditures and anticipated future expenditures made  
3 by your District, related to youth mental health?

4      Yes  No  
5

6 If yes, provide a copy and identify the documents(s) responsive to this question.  
7

8 27. Do you possess any existing report, survey, analysis, study or other document that provides  
9 an overview of or describes known costs incurred or damages sought as a result of any  
10 harms to your district which you attribute to social media?  
11

12      Yes  No  
13

14 If yes, provide a copy and identify document(s) responsive to this question.  
15

16 **VI. INTERACTIONS WITH DEFENDANTS**

17 28. Have you, any schools in your district, or any affiliated organization (i.e., a parent-teacher  
18 association) communicated with any of the Defendants regarding students' use of social  
19 media? Note: This question is limited to individuals authorized to speak on behalf of the  
20 district or school and is not meant to include marketing or routine customer service  
21 correspondence, e.g., account registration, password resets, help desk questions, or the  
22 district's use of Defendants' platforms for communicating with third parties.  
23

24      Yes  No  
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26 If yes, please describe the timeframe and general nature of the communications.  
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1           **If yes**, for each lawsuit, state (1) the court in which the lawsuit was filed; (2) the case name;  
2           (3) the civil action or docket number assigned to the lawsuit; and (4) your involvement or  
3           claims in the lawsuit.

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11           30. Has your district incorporated the use of any of Defendants' platforms in its curriculum  
12           since the 2017-2018 school year?

13           \_\_\_\_ Yes \_\_\_\_ No

14           **If yes**, please generally describe and identify which platform(s).

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22           31. Have you received any grant, donation, or other funding from any of the Defendants?

23           \_\_\_\_ Yes \_\_\_\_ No

24           **If yes**, describe generally the grant/donation/funding, state the approximate date of  
25           receipt, and identify which Defendant it came from.

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**VII. SCHOOL POLICIES FOR ELECTRONIC DEVICES, INTERNET, AND SOCIAL MEDIA USE**

32. Has the district drafted or implemented any disciplinary codes, policies, or codes of conduct that address students' use of the internet or social media on school property from the 2017-2018 school year to present?

Yes  No

**If yes**, attach copies of the relevant codes or policies.

33. Has the district drafted or implemented any disciplinary codes, policies, or codes of conduct that address students' use of the internet or social media off school property from the 2017-2018 school year to present?

Yes  No

**If yes**, attach copies of the relevant codes or policies.

34. Has the district drafted or implemented any disciplinary codes, policies, or codes of conduct that address teachers' use of the internet or social media on school property from the 2017-2018 school year to present?

Yes  No

**If yes**, attach copies of the relevant codes or policies.

35. Has the district drafted or implemented any disciplinary codes, policies, or codes of conduct that address teachers' use of the internet or social media off school property from the 2017-2018 school year to present?

Yes  No

**If yes**, attach copies of the relevant codes or policies.

1 36. Has the district drafted or implemented any disciplinary codes, policies, or codes of  
2 conduct that address students' use of electronic devices, e.g., cell phones, on school  
3 property from the 2017-2018 school year to present?

4       Yes  No

5      **If yes**, attach copies of the relevant codes or policies.

6 37. Has your district ever had a policy and/or program whereby students are issued tablets,  
7 laptops, or similar devices for students' use in the course of the school year for educational  
8 purposes?

9       Yes  No

10      **If yes**, please provide the policy since the 2017-2018 school year or generally describe the  
11 policy and/or program, including material changes since the 2017-2018 school year.

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18 **VIII. SOCIAL-MEDIA AND MENTAL HEALTH SERVICES AND PROGRAMS**

19 38. Describe the portion of your student body receiving mental health services in your district  
20 and how it has changed over time since the 2017-2018 school year, including approximate  
21 numbers and percentages if available in any existing report, survey, analysis, study or other  
22 document that provides an overview of or describes student mental health services. Note:  
23 This question is not designed to require review of underlying individual student records.

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4 39. Have you formally proposed, formed, or participated in any district-wide task force, other  
5 program, or group to address issues related to social media use or youth mental health  
6 among students?

7 \_\_\_\_\_ Yes \_\_\_\_\_ No  
8

9 **If yes**, identify the name of any such program(s), what aspects of student social media use  
10 and/or mental health were addressed, and the approximate dates of the district's  
11 participation in the task force, group, or program.  
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18 40. Have you formally proposed, formed, or participated in any district-wide task force, other  
19 program, or group to address behavioral issues, bullying, absences, substance abuse,  
20 mobile device use, addiction, and/or vaping?

21 \_\_\_\_\_ Yes \_\_\_\_\_ No  
22

23 **If yes**, identify the name of any such program(s), what student issues were addressed, and  
24 the approximate dates of the district's participation in the task force, group, or program.  
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5 41. Has your district provided trainings for employees on how to address student mental health  
6 issues relating to social media?

7 \_\_\_\_\_ Yes \_\_\_\_\_ No

8 If yes, please generally describe what types of trainings were offered by your district, when  
9 they were offered, whether attendance at the trainings was mandatory or optional, and the  
categories of employees at the district that were required to attend.

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18 42. Does your district use or provide any materials to students, parents, teachers, or staff  
19 regarding the potential risks or adverse effects of using electronic devices, the internet  
and/or social media?

20 \_\_\_\_\_ Yes \_\_\_\_\_ No

21 If yes, provide a copy and identify the document(s) responsive to this question.

22 **IX. INCIDENCE OF OTHER TRAUMATIC EVENTS**

23 43. Was your district ever closed to in-person learning during the COVID-19 pandemic?

24 \_\_\_\_\_ Yes \_\_\_\_\_ No

25 If yes, please generally describe when schools were closed, when remote learning was  
26 offered, and when students came back to in-person learning.

1 Please also provide any written district-wide policies implementing remote learning.

2 **X. FINANCIAL INFORMATION**

3 44. Provide the district's overall budget for each year from the 2017-2018 school year to the  
4 present.

5 <b>Year</b>	6 <b>Overall Budget</b>
7 2023-2024	
8 2022-2023	
9 2021-2022	
10 2020-2021	
11 2019-2020	
12 2018-2019	
13 2017-2018	

14 45. What is the approximate annual amount budgeted for health services in the district, if  
15 separately budgeted/itemized? Has that amount increased or decreased by more than 20%  
16 since the 2017-2018 school year?

17      Yes      No

18     **If yes, please describe.**

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4 46. What is the approximate annual amount budgeted for mental health services in the district,  
5 if separately budgeted/itemized? Has that amount increased or decreased by more than 20%  
6 since the 2017-2018 school year?  
7

8      Yes      No  
9

10     **If yes, please describe.**  
11  
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16     **XI. DOCUMENTS RELATING TO MENTAL HEALTH, SOCIAL MEDIA USE,**  
17     **OTHER EVENTS, AND EXPENDITURES**

18     **A. Prevalence**

19 47. Do you possess any existing report, survey, analysis, study or other document that  
20 provides an overview of or describes the prevalence of or number of students with  
21 reported mental health issues in your district and the possible causes of those issue?  
22

23      Yes      No  
24

25     **If yes, provide a copy and identify the document(s) responsive to this question.**  
26

27 48. Do you possess any existing report, survey, analysis, study or other document that provides  
28 an overview of or describes the prevalence of the harms associated with student social  
media use in your district, including associated mental health issues and classroom  
disruption?  
29

30      Yes      No  
31

1                   **If yes**, provide a copy and identify the document(s) responsive to this question.

2                   49. Do you possess any existing report, survey, analysis, study or other document that provides  
3                   an overview of or describes the prevalence of students in the district receiving mental  
4                   health services through the district?

5                   \_\_\_\_ Yes \_\_\_\_ No

6                   **If yes**, provide a copy (should include students at each level if part of the document(s)) and  
7                   identify the document(s) responsive to this question.

8                   50. Do you possess any existing report, survey, analysis, study or other document that provides  
9                   an overview of or describes the prevalence of social media use in your district and/or the  
10                  impact of social media use in your district?

11                  \_\_\_\_ Yes \_\_\_\_ No

12                  **If yes**, provide a copy and identify the document(s) responsive to this question.

13                  51. Do you possess any existing report, survey, analysis, study or other document that provides  
14                  an overview of or describes traumatic events, i.e. school shooting, violence at school by a  
15                  non-student or non-staff members, or threats of violence?

16                  \_\_\_\_ Yes \_\_\_\_ No

17                  **If yes**, provide a copy and identify the document(s) responsive to this question.

18                  52. Do you possess any existing report, survey, analysis, study or other document that provides  
19                  an overview of or describes attempted or completed suicides among staff or students?

20                  \_\_\_\_ Yes \_\_\_\_ No

21                  **If yes**, provide a copy and identify the document(s) responsive to this question

22                  **B. Discipline measures**

23                  53. Do you possess any existing report, survey, analysis, study or other document that provides  
24                  an overview of or describes interventions, discipline, or other consequences imposed on  
25                  students for using social media on school premises?

26                  \_\_\_\_ Yes \_\_\_\_ No

27                  **If yes**, provide a copy and identify the document(s) responsive to this question.

1 54. Do you possess any existing report, survey, analysis, study or other document that provides  
2 an overview of or describes disciplinary issues among students in your district, possible  
3 causes of those issues, and any interventions and/or consequences imposed?

4  Yes  No  
5

6 If yes, provide a copy and identify the document(s) responsive to this question.  
7

#### **CERTIFICATION**

8 I have made reasonable inquiries to answer the foregoing questions. Based on my personal  
9 knowledge and the information provided by other district employees, I declare under penalty of  
10 perjury that the information provided in this Plaintiff Fact Sheet is complete, true, and correct to  
11 the best of my knowledge and information, and that I have provided all of the requested documents  
12 that are reasonably accessible to me and/or my attorneys, to the best of my knowledge.  
13

14 \_\_\_\_\_  
15 Signature

16 \_\_\_\_\_  
17 Date

18 \_\_\_\_\_  
19 Name (Printed)

20 \_\_\_\_\_  
21 Title